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11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA
14

15 IN RE: SOCIAL MEDIA ADOLESCENT
16 ADDICTION/ PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No.: 4:22-MD-03047-YGR

MDL No.: 3047

17 This Document Relates to:

18 Maria Elena Rodriguez, individually and as
19 parent and next friend to minor Plaintiff M.G.

20 Member Case No.: 4:24-cv-1983

**UNOPPOSED MOTION FOR LEAVE TO
DEPOSE INCARCERATED FACT
WITNESS**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

22 Defendants Snap Inc., Meta Platforms, Inc., Instagram, LLC, Facebook Payments, Inc.,
23 Siculus, Inc., Facebook Operations, LLC, and ByteDance Ltd., ByteDance Inc., TikTok Ltd. and
24 TikTok, LLC, TikTok Inc., YouTube, LLC, and Google LLC (collectively, "Defendants"), move
25 this honorable Court for leave to depose Juan Guzman-Corchado, the father of M.G., and as grounds
26 therefore, state as follows:
27
28

1 1. Juan Guzman-Corchado is an incarcerated individual committed to the Georgia
2 Department of Corrections and is currently housed at the Riverbend Correctional Facility (“RCF”)
3 in Milledgeville, Georgia.

4 2. Pursuant to Rule 30(a)(2)(B) of the Federal Rules of Civil Procedure, the deposition
5 of an incarcerated person may be taken only with leave of the Court. The Court “must grant leave to
6 the extent consistent with Rule 26(b)(1) and (2).”
7

8 3. It is necessary to take the deposition of Juan Guzman-Corchado because he has
9 knowledge of alleged facts relating to Plaintiff’s allegations and claimed injuries in this litigation. In
10 particular, Juan Guzman-Corchado is the father of M.G., lived with Plaintiff, M.G., and her family
11 at times during the Relevant Time Period, was present at times during relevant care and treatment,
12 and may have knowledge of M.G.’s alleged social media use and claimed mental health injuries. As
13 such, granting leave to take the deposition of Juan Guzman-Corchado is consistent with Rule
14 26(b)(1) and (2).
15

16 4. Undersigned counsel has contacted counsel of record for Plaintiff, and Plaintiff’s
17 counsel does not object to this motion. All counsel have agreed to depose Juan Guzman-Corchado
18 on March 18, 2025 at RCF, pursuant to scheduling coordination with the correctional facility.
19

20 5. Undersigned counsel will coordinate with staff at RCF to ensure compliance with
21 institutional protocols and security requirements.

22 WHEREFORE, Defendants respectfully request that the Court grant them leave to take the
23 deposition of the incarcerated fact witness, Juan Guzman-Corchado.

24 Dated: January 7, 2025

Respectfully submitted,

25 **SKADDEN, ARPS, SLATE, MEAGHER &**
26 **FLOM LLP**

27 /s/ Jessica Davidson

28 Jessica Davidson (*pro hac vice*)
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ATTESTATION

I, Jessica Davidson, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: January 7, 2025

/s/ Jessica Davidson
Jessica Davidson (*pro hac vice*)